

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
***Pro Se [Non-Prisoner] Complaint Form***

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2006 FEB 27 P 2:23

*Enter the full name of the plaintiff in this action*

Robert J. Tretola  
v.

Civil Action No. 0:06-590-CMC-BM  
(to be assigned by Clerk)

*Enter below the full name of defendant(s) in this action. If possible, please list only one defendant per line.*

Ronald M. Singer  
Christopher Cozad  
Southcross Surgery Center, LLC  
Southcross Management Group, LLC  
Southcross Development Co., LLC  
Kevin A. O'Brien, Esquire  
Alston & Byrd LLP  
Marguerite S. Willis  
Nexsen Pruet Adams Kleemeier, LLC  
Scott C. Nehrbass, Esquire  
Shook, Hardy & Bacon, LLP

*If allowed by statute, do you wish to have a trial by jury?* Yes ☒

No ☐

**I. PREVIOUS LAWSUITS**

A. *Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action?*

Yes ☒ No ☐

- B. *If your answer to A is Yes, describe the lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.*

1. *Parties to this previous lawsuit:*

Plaintiff: Robert J. Tretola

Defendant(s): Ronald M. Singer, Christopher Cozad, Southcross Surgery Center, LLC

2. Court: Lancaster  
(If federal court, name the district; if state court, name the county)

3. Docket Number: 03-CP-29-246

4. Name(s) of Judge(s) to whom case was assigned: Kenneth Goode, D. Garrison Hill

5. Status of Case: Appealed Summary Judgement  
(For example, was the case dismissed? Settled? Appealed? Still Pending?)

6. Date lawsuit was filed: March 2003

7. Date of disposition (if concluded): \_\_\_\_\_

- C. *Do you have any other lawsuits pending in the federal court in South Carolina?*

Yes ☐ No ☒

## II. PARTIES

*In Item A below, place your name and address in the space provided. Do the same for additional plaintiffs, if any.*

A. Name of Plaintiff: Robert J. Tretola

Address: 1228 Colonial Commons, Lancaster, SC 29720

*In Item B below, place the full name of the defendant; and his, her, or its address, in the space provided. Use Item C for additional defendants, if any.*

B. Name of Defendant: Ronald M. Singer

Address: 10512 Park Road, Ste. 113  
Charlotte, NC. 28210

- C. *Additional Defendants (provide the same information for each defendant as listed in Item B above):*

See attached page

### **III. STATEMENT OF CLAIM**

*State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the name(s) of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets if necessary.*

See attached page

**III. STATEMENT OF CLAIM - *continued.***

See attached page

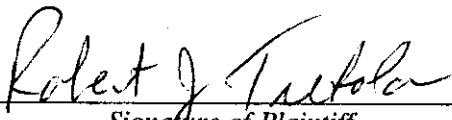
**IV. RELIEF.**

*State briefly and exactly what you want this court to do for you.*

See attached page

***I declare under penalty of perjury that the foregoing is true and correct.***

Signed this February day of 27, 2006.

  
\_\_\_\_\_  
Signature of Plaintiff